

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
Dallas Division**

ASSOCIATED RECOVERY, LLC,
Plaintiff,

v.

JOHN DOES 1-44, et. al.,
Defendants.

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Case No. 3:16-CV-1025-L
*(Consolidated with Civil Action Nos.
3:17-CV-424-L and 3:17-CV-651-L)*

MOTION FOR VOLUNTARY DISMISSAL

TO THE HONORABLE COURT:

COMES NOW, Plaintiff Associated Recovery, LLC, and would show the Court the following:

1. Plaintiff Associated Recovery, LLC, no longer wishes to prosecute the claims it is asserting against Registrant Defendants SocialBon Inc., Floridians LLC, Media Options Inc., Telepathy Inc., News Ltd., JRS Holdings LLC, Sylvia O'Donohoe, Virtual Investments LLC, and Quinn Vesey for breach of contract and recovery of attorneys' fees, as set forth primarily in ¶ 49 of Plaintiff's Third Amended Complaint (Dkt 123), and therefore, moves the Court to dismiss those claims without prejudice.¹
2. None of the Registrant Defendants specifically identified in the preceding paragraph has asserted any type of counter-claim against Plaintiff Associated Recovery, LLC.

¹ On April 11, 2018, the Court granted Plaintiff Associated Recovery, LLC's motion for voluntary dismissal of *all* claims asserted against Defendant Strong, Inc. with prejudice against refiling. See Dkt 171.

WHEREFORE, PREMISES CONSIDERED, Plaintiff Associated Recovery, LLC, respectfully request this Honorable Court to:

1. Dismiss the claims for breach of contract and recovery of attorneys' fees Plaintiff Associated Recovery, LLC, is asserting against Registrant Defendants SocialBon Inc., Floridians LLC, Media Options Inc., Telepathy Inc., News Ltd., JRS Holdings LLC, Sylvia O'Donohoe, Virtual Investments LLC, and Quinn Vesey without prejudice; and
2. Grant such other relief, both special and general, at law and in equity to which Plaintiff Associated Recovery, LLC is justly entitled.

Respectfully submitted,

/s/ Jack T. Jamison

JACK T. JAMISON

State Bar No. 10562550

1509 Main St., No. 205

Dallas, Texas 75201

Tel: (469) 802-9451

Cell: (214) 402-7654

jack@jackjamisonattorney.com

ATTORNEY FOR PLAINTIFF
ASSOCIATED RECOVERY, LLC

CERTIFICATE OF SERVICE

On the 11th day of April, 2018, a true and correct copy of the foregoing document was electronically submitted to the Clerk of Court for the United States District Court for the Northern District of Texas, using the ECF system. I hereby certify that I have served the lead counsel for each Defendant and each *pro se* Defendant through the Court's electronic filing and service system.

/s/ Jack T. Jamison
JACK T. JAMISON

ATTORNEY FOR PLAINTIFF
ASSOCIATED RECOVERY, LLC